

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re NATIONAL PRESCRIPTION OPIATE LITIGATION)	No. 1:17-md-2804
)	
)	Judge Dan A. Polster
)	
This Document Relates To:)	
)	
<i>ALL CASES</i>)	
)	

**DECLARATION OF EVAN M. JANUSH IN SUPPORT OF PLAINTIFFS'
MOTION FOR SANCTIONS AGAINST THE ALLERGAN AND TEVA DEFENDANTS**

1. I, Evan M. Janush, am Managing Attorney of the Pharmaceutical Practice of the Lanier Law Firm, which is a member of the Plaintiffs' Executive Committee ("PEC") in the National Prescription Opiate Litigation, MDL 2804. I submit this declaration in support of Plaintiffs' Motion for Sanctions Against the Allergan and Teva Defendants.

2. Attached hereto are true and correct copies of the following exhibits.

Exhibit	Description
Exhibit 1:	Teva_IQVIA_0020874-882 [filed under seal] ;
Exhibit 2:	ALLERGAN_MDL_02468982-994 (Ex. 15 to Napoli Tr.);
Exhibit 3:	Relevant excerpts from the transcript of the videotaped deposition of Thomas P. Napoli, taken January 17, 2019;
Exhibit 4:	Email from Special Master Cohen to All Parties, dated April 19, 2019;
Exhibit 5:	Letter from Donna Welch to Peter Weinberger and Evan Janush, dated February 19, 2019, with Exhibits A-C thereto;
Exhibit 6:	E-mail string from Catie Ventura to Tom Egler, dated April 24, 2019;
Exhibit 7:	E-mail string from Richard Shepard to Tom Egler, et al., dated May 2, 2019, and attaching a letter;
Exhibit 8:	E-mail string from Patrick Oot to Evan Janush and Jonathan Maier, dated August 6, 2020;
Exhibit 9:	E-mail string from Jonathan Maier to Evan Janush, dated August 20, 2020;
Exhibit 10:	Allergan_MDL_02176488-492 (Ex. 12 to Napoli Tr.) [filed under seal] ;
Exhibit 11:	Letter from Karl Stampfl to Dory Antullis, dated August 11, 2020;
Exhibit 12:	ALLERGAN_MDL_03641386-89 (Ex. 8 to Woods 30(b)(6) Tr.);
Exhibit 13:	ALLERGAN_MDL_02146521-25 (Ex. 10 to Woods 30(b)(6) Tr.);
Exhibit 14:	E-mail string from Tom Egler to Donna Welch, Jennifer Levy, and Karl Stampfl, dated April 16, 2019;
Exhibit 15:	Letter from Tom Egler to Donna Welch, Jennifer Levy, Rebecca Hillyer, and Jonathan Maier, dated May 22, 2019;
Exhibit 16:	Letter from Donna Welch to Tom Egler, dated May 31, 2019;
Exhibit 17:	Letter from Rebecca Hillyer to Tom Egler, dated May 31, 2019;
Exhibit 18:	Letter from Tom Egler to Donna Welch, Jennifer Levy, Rebecca Hillyer, and Jonathan Maier, dated June 12, 2019;
Exhibit 19:	Teva_IQVIA_00004558-559 [filed under seal] ; and

Exhibit 20: Letter from Rebecca Hillyer to Peter Weinberger and Evan Janush, dated February 22, 2019, with Exhibits A-J thereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 31, 2020, at New York, New York.



EVAN M. JANUSH

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of August, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

/s/Peter H. Weinberger

PETER H. WEINBERGER

Plaintiffs' Liaison Counsel